

EPD's comments on the likely significant environmental effects of the proposed modifications to the Operational Programme 1

1. Summary

- 1.1 PPCD within OPM is proposing modifications to the Operational Programme 1 (OP1). The main changes focus on the potential funding of three new projects, as follows:
- Plants for the further treatment of treated sewage effluent, mainly within the footprint of the existing Sewage Treatment Plants (STPs);
 - A plant to treat manure and generate electricity (biomass), in an area at Siggiewi planned as a farm cluster with a manure treatment plant; and
 - An Oncology Centre within the footprint of the existing Mater Dei Hospital.
- 1.2 Other important modifications include revisions to the sections of OP1 dealing with Mechanical and/or Biological Treatment Plants (MBTs), the National Flood Relief Project, renewable energy and the Delimara Power Station.
- 1.3 The proposed modifications to OP1 fall within the scope of Regulation 4(3) of Legal Notice 497 of 2010 and therefore, have been screened by PPCD in order to determine the need for an SEA.
- 1.4 Section 2 of this report includes a preliminary assessment of the main issues.

Conclusion

- 1.5 Most of the proposed revisions to OP1 focus on specific projects which are already being reviewed by MEPA as part of its environmental assessment and permitting mechanisms. These revisions are likely to give rise to site-specific and localised environmental issues. MEPA considers that the proposed revisions do not require further detailed assessment at plan stage. Further assessment will be required at project stage. Therefore, most of the proposed revisions are unlikely to have a significant environmental impact from a strategic point of view.
- 1.6 If animal manure is co-mingled with the organic fraction from mixed MSW, the final output from the MBT (North) plant will not classify as recycling and could therefore not be applied on agricultural land. This would lead to the loss of animal manure which could have been used on agricultural land if not co-mingled with the organic fraction from mixed MSW. This could be solved by treating both waste streams separately. Furthermore, if in the future Malta is faced with biowaste recycling targets, the proposed MBT (North) plant would have to stop accepting mixed MSW and would have to adjust itself to accept source segregated biowaste in order for the output to count towards recycling. The latter would also result in an end-of-waste compost that could be used for agricultural purposes. This would imply the introduction of source separation collection systems for biowaste in Malta.

- 1.7 These comments are provided without prejudice to MEPA's assessment of the specific proposals mentioned in OP1 (or revisions thereof) at project stage.

2. EPD's preliminary assessment of the likely significant environmental effects of the proposed modifications to the Operational Programme 1

Main proposed changes to OP1	EPD's preliminary assessment	EPD's position/recommendations
NEW PROJECTS INCLUDED IN OP1		
<p>1. New polishing plants for the further treatment of treated sewage effluent, mainly within the footprint of the existing Sewage Treatment Plants (STPs).</p>	<p><u>EIA:</u> The further treatment of TSE does not fall directly, as a separate category, in the EIA Regulations. However, all three STPs have been subjected to an Environmental Impact Statement. Therefore, the proposed polishing plants are being screened in terms of Schedule IB of the EIA Regulations.</p> <p><u>Appropriate Assessment:</u> None of the proposed plants is expected to give rise to significant impacts on Natura 2000 sites / habitats / species. Therefore, no further assessment is required as per Regulation 19 of Legal Notice 311 of 2006 (as amended). The proposed plants at Ras il-Hobz (Ghajnsielem, Gozo) and Ta' Barkat (Xghajra) are located away from Natura 2000 sites / habitats / species. The proposed plant at (ic-Cumnija) Mellieha was assessed in more detail in view of the potential impacts on nearby rock/coral outcrop, which can be considered as habitat type 1170 (reefs). Following further assessment at project stage it was concluded that no significant impacts are expected.</p>	<p>No significant environmental impacts are envisaged from a strategic point of view. Site-specific and localised environmental issues, including operational issues, are or will be addressed at project stage through MEPA's environmental assessment and permitting mechanisms. Mitigation measures will be addressed at project stage.</p>
<p>2. A new plant to treat manure and generate electricity (biomass) at Siggiewi.</p>	<p>The proposal will be located in an area planned as a farm cluster with a manure treatment plant having a capacity to receive around 42,000 tonnes of manure generated from the surrounding farms. The proposed plant is expected to</p>	<p>No significant environmental impacts are envisaged from a strategic point of view. Site-specific and localised environmental issues, including operational issues, will be</p>

	<p>treat manure generated from the surrounding farms and to generate biomass.</p> <p><u>EIA:</u> The proposal is subject to an Environmental Impact Statement and is currently being processed by MEPA. The EIA process is at an advance stage</p>	<p>addressed at project stage through MEPA's environmental assessment and permitting mechanisms. Mitigation measures will be addressed at project stage.</p>
<p>3. A new Oncology Centre within the footprint of the existing Mater Dei Hospital.</p>	<p><u>EIA:</u> The EIA screening process concluded that the project does not qualify for an EIA. No significant environmental impacts, including impacts on air quality, were envisaged. The EIA screening was carried out in accordance with Schedule IB of the EIA Regulations, 2007.</p>	<p>No significant environmental impacts are envisaged from a strategic point of view. Site-specific and localised environmental issues, including operational issues, will be addressed at project stage through MEPA's environmental assessment and permitting mechanisms. Mitigation measures will be addressed at project stage.</p>
REVISED TEXT IN OP1		
<p>4. Revisions to the text regarding the setting up of one or more Mechanical and/or Biological Treatment Plants (MBTs). The current OP1 states that MBTs will also treat agricultural waste such as manure. The revised OP1 tones down this statement but still highlights the opportunities associated with the co-mingling of manure with municipal waste. It also states that co-mingling of animal manure to MSW may be considered as part of this project.</p>	<p><u>EIA:</u> MEPA is reviewing proposals for three MBT plants which are subject to an EIA in accordance with the EIA Regulations, 2007. These plants also require an environmental permit to operate.</p> <p><u>Appropriate Assessment:</u> The proposed MBTs at Naxxar (Maghtab) are not expected to have any significant impacts on Natura 2000 sites. Therefore, such proposals do not require further assessment as per Regulation 19 of Legal Notice 311 of 2006 (as amended). Further assessment has been requested on the proposed Gozo MBT. However, the main issues focus on detailed considerations at project level rather than strategic environmental issues.</p> <p><u>Waste Management:</u> Most of the issues associated with these projects are site-specific and localised. The</p>	<p>The previous statement in OP1, referring to the mixing of animal manure with the organic fraction from mixed MSW, has been toned down in the revised text. However, MEPA notes that the mixing of such wastes is still being considered as an option as part of the MBT project. MEPA believes that both waste streams are to be treated separately so as to avoid a situation whereby the output would not classify as compost that could be used on agricultural land. MEPA further believes that the MBT plant would have to accept source separated biowaste should future EU-wide biowaste recycling targets be adopted. This would entail the need of source separated collection systems from Maltese</p>

	<p>European Commission is drafting end-of-waste criteria for biodegradable waste which exclude disgestate/compost from MBT plants which treat mixed MSW, from achieving an end-of-waste status. Therefore, if animal manure is co-mingled with the organic fraction from mixed MSW, the final output from the MBT (North) plant would automatically not classify as recycling and could therefore not be applied on agricultural land. This would lead to the loss of animal manure which could have been used on agricultural land if not co-mingled with the organic fraction from mixed MSW. This could be solved by treating both waste streams separately.</p> <p>Furthermore, the treatment of mixed MSW could prejudice Malta's potential to achieve future EU-wide biowaste recycling targets which the European Commission intends to introduce some time in 2012/13 as the resulting compost would not reach end-of-waste status as the draft criteria exclude mixed MSW from the input materials. If in the future Malta is faced with biowaste recycling targets, the proposed MBT (North) plant would have to stop accepting mixed MSW and would have to adjust itself to accept source segregated biowaste in order for the output to count towards recycling. The latter would also result in an end-of-waste compost that could be used for agricultural purposes. This would imply the need to introduce source separation collection systems for biowaste in Malta.</p> <p>WasteServ's consultant replied to MEPA's comments and confirmed that animal manure and biowaste will be processed separately in the MBT (North) plant. However, from the proposed revisions to the text in OP1, MEPA</p>	<p>households and catering establishments.</p> <p>Moreover, the statement in the revised OP1 regarding the possible co-mingling of animal manure to the organic fraction from mixed MSW could also affect the current EIA process for the MBT (North) plant. The EIA for such plant progressed after WasteServ's consultant confirmed that animal manure and MSW will be processed separately.</p>
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	notes that the co-mingling of manure to MSW is still being considered as an option, contrary to the clarification provided by WasteServ's consultant.	
5. Revisions to the text regarding flood relief and the National Flood Relief Project . The revised OP1 highlights that the Project will seek to mitigate flooding in eleven localities, as opposed to the nine referred to in the current OP1. The revised OP1 states that the project "will also seek to explore and develop, where possible, flood water catchments and potential re-use facilities". The revised OP1 also makes reference to the construction of soakaway reservoirs or dams for aquifer re-charge.	<u>EIA</u> : The project was already subjected to an EIA in accordance with the EIA Regulations. All relevant issues were addressed as part of the EIA process at project stage, and in terms and conditions of the development permits that were subsequently issued.	The proposed amendments to the text are unlikely to raise significant environmental issues from a strategic point of view. Any future revisions to the Flood Relief Project are likely to be specific changes to a project. Site specific and localised issues (if any) will continue to be assessed at project stage.
6. Revisions to text regarding renewables , in particular the promotion and increase in use of renewable sources and Energy Efficiency measures. The revised OP1 also promotes pilot actions intended to explore the potential of large offshore wind farms as well as studies to promote a better understanding of the potential exploitation of RES.	MEPA notes that the revised text/additions to OP1 focus mainly on the promotion of measures aimed at increasing the use of renewables and energy efficiency. The details of such measures are not available as yet. The Competent Authority responsible for promoting pilot actions and studies on the potential of large offshore wind farms in Malta should have regard to the potential implications of such proposals on the marine environment and the requirements of the Marine Strategy Framework Directive.	The proposed amendment to the text is unlikely to raise significant environmental impacts from a strategic point of view. However, the Competent Authority responsible for promoting pilot actions and studies on the potential of large offshore wind farms in Malta should take into consideration the potential implications of such facilities on the marine environment and the requirements of the Marine Strategy Framework Directive.
7. Removal of the existing intervention in the current OP1 to	MEPA notes that Enemalta has implemented mitigation measures from its own funds and therefore, no further	n/a

<p>reduce emissions from power generation (modification and application of best available technologies to the boilers at the existing Delimara Power Station).</p>	<p>action is required in OP1.</p>	
<p>8. Other changes.</p>	<p>Other proposed revisions to the text of OP1 are unlikely to raise significant environmental concerns.</p>	<p>n/a</p>